

Williams AFB – Options for Resolving Informal Dispute for Site ST012

Option 1 – Implement EBR Activities as a Pilot Study (18-36 month timeframe)

- A. The RDRA Work Plan Addendum 2 would be renamed Pilot Study Implementation Work Plan. The overall goals will include evaluating the effectiveness of EBR on the dissolved phase constituents in achieving the Remedial Action Objectives (RAOs) of the 2013 Record of Decision Amendment (RODA).
- B. EBR as presented in the Pilot Study Implementation Work Plan may not sufficiently address LNAPL source control in order to achieve RAOs based on the current understanding of Site conditions. Data obtained from the Pilot Study will be used to determine if additional EBR or other appropriate technology implementation is needed to achieve the RAOs in the desired 20-year time frame ~~(extended by 18 months to account for the delays caused by informal dispute)~~.
- C. The Air Force would move forward with the proposed EBR injections.
- D. EPA, ADEQ, and the Air Force would collaboratively work together using the Pilot Study Work Plan Decision Matrix and Time of Remediation Modeling Estimates as a starting point to establish specific milestones and metrics to evaluate EBR performance, continuously updating the matrix and the framework for the deliverable noted in item F below.
- E. Periodic monitoring of the Pilot Study will be performed by the Air Force in accordance with the Pilot Study Implementation Work Plan and in consultation with the Agencies, including obtaining higher resolution data in at least one treatment zone in each of the hydrologic units.

If the Air Force chooses not to collect higher resolution data as requested or as described in Agency comments, the Parties will agree that the Pilot Study is not designed to evaluate EBR alone as a source control remedy, but will constitute only a demonstration of EBR to remediate dissolved phase contaminants. Data on LNAPL distribution and COC content will be required to show progress towards meeting RAOs in the future.

- F. Required ‘Deliverable’ no later than 36 months from the initial Pilot Study injections: the Air Force will complete a Pilot Study Implementation Report. The metrics and content of this Report would be established throughout the 18-36 month timeframe, with the goal of having an agreed upon framework to evaluate EBR’s primary goal (i.e., achieving RAOs within desired remedial timeframe).

All parties reserve their rights under the FFA Section 12. The parties would furthermore understand and agree that EBR may not be the sole remedial technology necessary at ST012 to achieve the RAOs within a desired timeframe. If EBR fails to meet performance milestones and

metrics, other potential remedial technologies will be evaluated and included in the Pilot Study Implementation Report.

Option 2 – Invoke Formal Dispute in accordance with the FFA

The Regulator Agencies would either collectively or separately invoke formal dispute over the Revised Draft Final RD/RA Work Plan Addendum 2, August 2017. The formal dispute process would then move forward in accordance with the FFA. ~~The resolution of the dispute would be consistent with the concepts in Option 1 except it would apply to implementation of the RODA remedy.~~